Application No. 10/602,680 Response dated November 7, 2007

Response dated November 7, 2007 Reply to Office Action of August 10, 2007

## REMARKS

Claims 1-18 are pending in the application. While no claims are amended hereby, Applicant has provided a listing of the claims for the convenience of the Examiner. Claims 1, 4-8, 10, and 13-17 stand rejected under 35 U.S.C. § 103(a) over U.S. Patent No. 6,597,956 to Aziz et al. ("Aziz") in view of U.S. Patent No. 7,096,266 to Lewin et al. ("Lewin"). Claims 2-3, 9, 11-12, and 18 are rejected under 35 U.S.C. § 103 over Aziz in view of Lewin and further in view of U.S. Patent No. 6,996,616 to Leighton et al. ("Leighton"). Applicant traverses and respectfully requests reconsideration and withdrawal of the rejections.

Claims 1, 4-8, 10, and 13-17 are rejected under § 103 over Aziz in view of Lewin.

Claims 2-3, 9, 11-12, and 18 are rejected under Aziz in view of Lewin and further in view of

Leighton. Claims 1, 9-10 and 18 are independent. Each of the independent claims recite "a shared
cache server being placed on a common network . . . a plurality of groups[], comprising: a storage
device to store contents in each of a plurality of storage areas allocated corresponding to said
plurality of groups." Nothing in Aziz, alone or in combination with Lewin or Lewin and Leighton,
disclose this limitation. At pages 2 and 5, the Office Action alleges that Aziz at column 6, line 66 to
column 7, line 8 and column 7, lines 26-42, discloses this claimed limitation. Applicant disagrees.

Aziz describes a virtual server farm (VSF) that has a subset of storage available on a storage area network (SAN). A subset of storage available on the SAN is referred to as a SAN Zone. Column 7, lines 9-25 - and which completes the omission from the Office Action's citation of Aziz - explains that a VSF is typically not shared among different organizations, and that the subset of storage on the SAN that belongs to a **single SAN Zone** and the set of VLANs associated with the SAN zone define a VSF. See column 7, lines 21-25. Moreover, a SAN Zone is coupled to one or more storage devices (column 7, lines 16-17, Figure 3, 306A, 306B). Thus, what Aziz shows is a single SAN Zone associated with a single VSF coupled to single or multiple storage devices. Hence, Aziz fails to show "a shared cache server . . . comprising: a storage device to store contents in each of a plurality of storage areas allocated corresponding to said plurality of groups," as required by independent claims 1, 9-10 and 18.

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Moreover, independent claims 1, 9-10 and 18 all recite "a shared cache server placed on a common network." Claims 1 and 10 recite that the shared cache server is placed on a common network "in which a plurality of virtual networks each being placed in a virtually partitioned manner is constructed corresponding to a plurality of groups;" and claims 9 and 18 recite that the shared cache server is placed on a common network "connected to a plurality of groups." Aziz, in stark contrast, describes an extensible computing system that includes a local computing grid. As Aziz explains at column 6, lines 28-46, the computing grid is composed of as many as 10,000 computing elements that do not store any long-lived or per-element state information; and the long-lived state information is stored in separate disks coupled to the computing elements via the SAN. Column 7, lines 18-25 of Aziz subsequently explains that "at any given point in time, a computing element in the computing grid, such as CPU1 of FIG. 2, is only connected to the set of VLANs and the SAN Zone(s) associated with a single VSF. The subset of storage on the SAN that belongs to a single SAN Zone and the set of VANs associated with it and the computing elements on these VLANs define a VSF."

Again what Aziz discloses is a single CPU corresponding to a single SAN Zone that define a single VSF. Thus Aziz's VSF would not accommodate a "shared cache server" with "a plurality of storage areas allocated corresponding to said plurality of groups" as any of Aziz's servers must be committed to a single group - a VSF. Accordingly, Applicant urges that Aziz does not teach "a shared cache server being placed on a common network" connected or corresponding to a "plurality of groups," that comprises "a storage area to store contents in each of a plurality of storage areas allocated corresponding to said plurality of groups," as required by independent claims 1, 9-10 and 18.

As nothing in Lewin or Lewin and Leighton cure the deficiency of Aziz as applied to the independent claims, Applicant urges that independent claims 1, 9-10 and 18 are presently in condition for allowance and urge reconsideration and withdrawal of the rejections thereto.

Moreover, as the remaining claims depend from independent claims 1, 9-10 and 18, and as nothing in Lewin or Leighton cure the deficiency of Aziz as applied to the independent claims. Applicant

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urges that all the claims are in condition for allowance and urge reconsideration and withdrawal of the rejections thereto.

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

No fee is believed to be due for this Amendment. Should any fees be required, please charge such fees to Deposit Account No. 50-2215.

Dated: November 7, 2007 Respectfully submitted,

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